

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED REFINING COMPANY

Plaintiff,

v.

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURG, PA,

ALLIANZ GLOBAL RISKS US
INSURANCE COMPANY,

CERTAIN UNDERWRITERS AT LLOYD'S
OF LONDON AND LONDON MARKET
INSURANCE COMPANIES,

XL INSURANCE (BERMUDA) LTD.,

SWISS RE INTERNATIONAL SE,

CHARTIS, and,

CRAWFORD & COMPANY d/b/a
CRAWFORD GLOBAL TECHNICAL
SERVICES,,

Defendants.

Civil Action No. 2:13-CV-00909-CDJ

DEFENDANTS' MOTION FOR LEAVE TO FILE A REPLY BRIEF IN SUPPORT OF
THEIR MOTION TO DISMISS

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that Defendants NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA ("National Union"); ALLIANZ GLOBAL RISKS US INSURANCE COMPANY ("Allianz"); CERTAIN UNDERWRITERS AT LLOYD'S OF LONDON SUBSCRIBING TO AJN0093509A09 (Syndicate 1183); CERTAIN

UNDERWRITERS AT LLOYD'S OF LONDON SUBSCRIBING TO EL900296 (Syndicates 2003, 2987, 9129); GREAT LAKES REINSURANCE (UK) PLC; INFRASSURE, LTD; GENERAL SECURITY INDEMNITY COMPANY OF ARIZONA; TORUS INSURANCE (UK) LTD; PARIS RE HOLDINGS, LTD; GLACIER INSURANCE; SWISS RE INTERNATIONAL SE ("Swiss Re"); XL (BERMUDA) INSURANCE LTD ("XL Bermuda") (collectively, "Insurer Defendants"); CHARTIS CLAIMS, INC. ("Chartis Claims") and CRAWFORD & COMPANY ("Crawford"), by its undersigned counsel, hereby moves the Court for leave pursuant to U.S. District Judge C. Darnell Jones, II's Policies and Procedures, Section A – Pre-trial Procedure, ¶ 5 to file a reply brief in response to Plaintiff's Memorandum of Law in Opposition to Defendants' Motion to Dismiss the Amended Complaint.

In support of its Motion for Leave to File a Reply Brief, Defendants assert as follows:

- 1) On April 2, 2013, Defendants filed its Motion to Dismiss Plaintiff's Amended Complaint.
- 2) On April 24, 2013, Plaintiff filed with the Court its Memorandum of Law in Opposition to Defendants' Motion to Dismiss.
- 3) After reviewing Plaintiff's Memorandum of Law, Defendants determined that it contained misstatements of facts and law.
- 4) Accordingly, for the reasons outlined in the attached Memorandum of Law, Defendants respectfully request that the Court grant its Motion for Leave to File a Reply Brief, and deem the

Reply Brief to address misstatements of facts and law, attached hereto as Exhibit "A", filed.

Respectfully submitted,

By: /s/ Amy M. Churan

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that I have on this 1st day of May, 2013, served the foregoing
DEFENDANTS' MOTION FOR LEAVE TO FILE A REPLY BRIEF IN SUPPORT OF THEIR
MOTION TO DISMISS, with Defendants' Reply in Support of Their Motion to Dismiss
included as Exhibit "A" and proposed Order via electronic filing, to the United States
District Court for the Eastern District of Pennsylvania and served a copy of the same via
the manner listed below and addressed as follows:

Via ECF Electronic Service to E-mail Address: dmcmullen@andersonkill.com

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